

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

City of Chicago;

City and County of Denver; and

Pima County;

Plaintiffs,

vs.

United States Department of Homeland
Security;

Kristi Noem, in her official capacity as
Secretary of the Department of Homeland
Security;

United States Federal Emergency Management
Agency;

David Robinson, in his official capacity as
Acting Administrator of the Federal Emergency
Management Agency;

Defendants.

Case No. 25-cv-5463

Hon. Matthew F. Kennelly

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs, through undersigned counsel, hereby move the Court for a Preliminary Injunction. This motion will be based upon all the records, files, and proceedings herein, as well as the legal memoranda, affidavits, exhibits, and arguments of counsel.

Plaintiffs request that the Court order Defendants to (a) undo their February 10, 2025, de-obligation of Shelter and Services Program funds and (b) process pending and future requests for reimbursement under the Shelter and Services Program in accordance with 2 C.F.R. § 200.305(b)(3) and other applicable law. Plaintiffs also request that the Court preliminarily enjoin Defendants, their officers, agents, servants, employees, and attorneys from (a) eliminating or

terminating the Shelter and Services Program, (b) de-obligating Shelter and Services Program funds during the pendency of this litigation, (c) withholding Shelter and Services Program funding for the reasons identified in the March 11 and April 1 Letters, and (d) terminating Shelter and Services Program grants for the reasons identified in the March 11 and April 1 Letters.

Dated: June 20, 2025

Respectfully Submitted,

Mary B. Richardson-Lowry,
Corporation Counsel of the City of Chicago

By: /s/ Lucy Prather

Lucy Prather (lucy.prather@cityofchicago.org)
Rebecca Hirsch (rebecca.hirsch2@cityofchicago.org)
Chelsey Metcalf (chelsey.metcalf@cityofchicago.org)
Stephen Kane (stephen.kane@cityofchicago.org)
City of Chicago Department of Law
121 North LaSalle Street, Room 600
Chicago, Illinois 60602
Tel: 312-744-4294
Attorneys for Plaintiff City of Chicago

LAURA CONOVER
PIMA COUNTY ATTORNEY

By: /s/ Kyle Johnson

Samuel E. Brown (sam.brown@pcao.pima.gov)
Bobby Yu (bobby.yu@pcao.pima.gov)
Kyle Johnson (kyle.johnson@pcao.pima.gov)
Pima County Attorney's Office, Civil Division
32 N. Stone, Suite 2100
Tucson, Arizona 85701
Tel: (520) 724-5700
Attorneys for Plaintiff Pima County

Katie McLoughlin
Acting City Attorney, City and County of
Denver

By: /s/ Matthew J. Mulbarger

Matthew J. Mulbarger
(matthew.mulbarger@denvergov.org)
Denver City Attorney's Office
201 W Colfax Avenue
Denver, CO 80202
Tel: 720-913-8050
*Attorneys for Plaintiff City and County of
Denver*